

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
AUG 12 2014
PUBLIC SERVICE
COMMISSION

In the matter of:

KURT AND LAYNE NETHERTON
COMPLAINANTS

}
}
}

CASE NO.
2014-00141

VS

}
}

KENTUCKY-AMERICAN WATER COMPANY
DEFENDANT

SUPPLEMENTAL DISCOVERY RESPONSES FOR
ANSWER TO KENTUCKY-AMERICAN WATER COMPANY'S FIRST REQUEST
FOR INFORMATION DATED MAY 30, 2014

8. State whether since July 1, 2013, any plumbing fixture at the residence at 3649 Winding Wood Lane have been installed, replaced, or repaired. If yes, describe the plumbing fixture, the nature of the action (installation, repair, replacement) and the date of the action.

Response By: Layne Netherton

The Netherton's would like to clarify that the repair done to the kitchen sink faucet on 11/23/14 was **not** performed by Mr. Netherton as he mentioned at the informal conference on 7/28/14. The repair was performed by A&B Appliance Repair as originally noted in the Responses. Please see attached repair bill as evidence of this repair.

**ANSWER TO KENTUCKY-AMERICAN WATER COMPANY'S FIRST REQUEST
FOR INFORMATION DATED MAY 30, 2014**
SUPPLEMENTAL DISCOVERY RESPONSES

9. Describe all work performed on the residence's piping or internal plumbing system since January 1, 2013.

Response By: Layne Netherton

All repairs to the residence's piping or internal plumbing system were done as recommended in the previously provided 2013 Home Inspection prior to the Netherton's owning the home.

Please see attached receipts for said repairs.

870845

Invoice

SOLD TO <i>Joe E. Cindy Jones</i>		SHIP TO	
ADDRESS <i>3649 Winding Wood Lane</i>		ADDRESS	
CITY, STATE, ZIP <i>Lex. Ky 40515</i>		CITY, STATE, ZIP	
CUSTOMER ORDER NO.	SOLD BY	TERMS	F.O.B.
			DATE <i>4-14-13</i>

ORDERED	SHIPPED	DESCRIPTION	PRICE	UNIT	AMOUNT
		<i>Punch list</i>			
		<i>Labor: 8.5 hrs @ 30.00</i>	<i>255.00</i>		
				<i>7.17</i>	
		<i>Materials: \$7.17</i>		<i>\$1262.17</i>	
		<i>\$212.06</i>		<i>40.00</i>	
		<i>\$219.23</i>		<i>\$302.17</i>	

DAY'S PLUMBING SUPPLY, INC.
 265 East Second Street
 Lexington, KY 40507
 (859) 254-6148

Day's Plumbing Supply Invoice # B-114627

Page: 1

Sold To:

04/13/13

Sign: _____

Account #: NO ACCT

QTY	ITEM NO.	DESCRIPTION	LIST	SALE	TOTAL
1	A74	DELTA Accent Tip for hdl.	9.99	7.46	7.46
1	RP26865	DELTA Set Screw	5.00	3.99	3.99
1	P9702DFB	1-1/2 PVC P-Trap Solvent	3.99	1.99	1.99
1	FGSLSJ	Wax Ring w/Flange	3.29	2.69	2.69
1	886-MR	Ringer S.S. Closet Repair Flange	4.99	3.99	3.99
1	PB4B-4	1/4" Closet Bolts Double Nuts & Washers	3.19	2.56	2.56

TOTAL ITEMS: 6 JOB: SUB TOTAL : 22.68
 SALES TAX : 1.36
 SALES PERSON: Rick TOTAL Cash : \$24.04

Due Date: / /

Discount Date: / /

All past due invoices incur a charge of 1.5% monthly (18% Annually). No refund on electric parts. No refund after 30 days.

**ANSWER TO KENTUCKY-AMERICAN WATER COMPANY'S FIRST REQUEST
FOR INFORMATION DATED MAY 30, 2014
SUPPLEMENTAL DISCOVERY RESPONSES**

12. Please provide all dates after July 1, 2013 in which the in-ground irrigation system was serviced or inspected for any reason and provide copies of the job service tickets and invoices for each of these occasions.

Response By: Layne Netherton

The date listed on page 13 of the responses incorrectly indicated the system was winterized on 11/14/13. **The date of the winterization was 11/4/13.** The winterization date was correctly referenced as 11/4/13 throughout the Response as follows:

- A. Page 14 Answer to Question 13 of the First Request for Information
- B. Page 20 Answer to Question 19 of the First Request for Information
- C. Exhibit B. Notes on Invoice from Irrigation System Winterizing
- D. Exhibit C. E-mail from owner of company that performed the winterizing

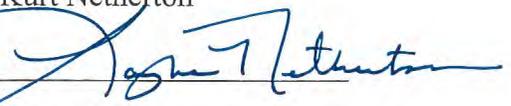
Please note, according to the Responses provided by Kentucky-American Water Company, the meter logs indicated the meter on the property at 3649 Winding Wood was read on November 5, 2013, the day after the irrigation system was winterized. This reading indicated no abnormal water usage.

Respectfully submitted,

Kurt and Layne Netherton
3649 Winding Wood Lane
Lexington, KY 40515
(859)-536-8875
layniemia@yahoo.com

By 

Kurt Netherton

By 

Layne Netherton

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Request for Information has been served via US Mail this the 10th day of August, 2014 to Hon. Lindsey W. Ingram III, 300 West Vine Street, Suite 2100, Lexington, KY 40507 and to Cheryl D Norton, 2300 Richmond Road, Lexington, KY 40502 and the Public Service Commission, 211 Sower Blvd., Box 615, Frankfort, Kentucky 40602-0615.


Kurt Netherton


Layne Netherton